

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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Denis Fakhurtdinov, *on behalf of himself and
others similarly situated in the proposed FLSA
Collective Action,*

Case No.: 24-cv-01696

Plaintiff,

NOTICE OF MOTION

- against -

Hon. Sanket J. Bulsara, U.S.M.J.

ITG Communications, LLC, Domestic Supply
Inc., and Danila Barannikov,

Defendants.

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PLEASE TAKE NOTICE that upon the annexed Memorandum of Law dated December 9, 2024, together with the supporting declaration of Jason Mizrahi, Esq. and the exhibits annexed thereto, Plaintiff Denis Fakhurtdinov (the “Plaintiff”), by his attorney Levin-Epstein & Associates, P.C., will move this Court, the Honorable Magistrate Sanket J. Bulsara presiding, at the courthouse located in 225 Cadman Plaza E, Brooklyn, NY 11201, for an order: (i) affirming the parties’ settlement agreement; (ii) scheduling a fairness hearing under *Cheeks*; and (iii) sanctioning Defendants Domestic Supply Inc., and Danila Barannikov (together, the “Domestic Supply Defendants”) under pursuant to 28 U.S.C. § 1927, the Court’s inherent authority.

PLEASE TAKE FURTHER NOTICE that answering papers, if any, must be served on or before December 23, 2024, and Plaintiff’s reply must be served on or before December 30, 2024.

Dated: December 9, 2024
New York, New York

LEVIN-EPSTEIN & ASSOCIATES P.C.

By: /s/ Jason Mizrahi
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Cc: All parties via ECF